

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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PROARCH DESIGN SOLUTIONS, LLC

Docket no. 1:15 cv 04542
(DLI) (SSJB)

Plaintiff,

- against -

**NOTICE OF MOTION TO
ENFORCE SETTLEMENT
AND ENTER JUDGMENT**

LAZERCAD INC., MICHAEL AXON,
CAPITAL ONE FINANCIAL CORP., 360
DESIGN STUDIO LLC, M. ARTHUR
GENSLER JR. & ASSOCIATES, INC.,
JONES LANG LASALLE, INC., and
PRIMARK US CORP.

Defendants.
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To: George Benaour, Esq.
Benaour Law LLC
150 West 56th Street
New York, NY 10019
Attorney for Defendants
Lazercad, Inc. & Michael Axon

Via ECF; email george@benaurlaw.com;
And regular mail

PLEASE TAKE NOTICE that on a date and time to be designated by the Court, upon the accompanying affidavit of H. Jonathan Rubinstein, Esq.; the undersigned attorneys will move this Court, before the Honorable Dora Lizette Irizarry, U.S.D.J., C.J., at the Federal Courthouse for the United States District


Court of the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York, for the entry of an Order:

- a) enforcing the settlement agreement dated October 28, 2019;
- b) entering judgment in favor of plaintiff Proarch Design Solutions, LLC and against defendants Lazercad, Inc. & Michael Axon, jointly and severally, in the principal amount of \$130,000.00, together with prejudgment interest, counsel fees and costs pursuant to the terms of the settlement agreement; and
- c) for such other and further relief that the Court deems just and appropriate under the circumstances.

PLEASE TAKE FURTHER NOTICE that the moving parties shall rely upon an affidavit of counsel, submitted simultaneously herewith.

PLEASE TAKE FURTHER NOTICE that oral argument is not requested unless opposition hereto is received, in which case oral argument is requested.

Dated: Millburn, NJ
February 19, 2020



H. Jonathan Rubinstein, Esq.
THE FEINSILVER LAW GROUP, P.C.
Attorneys for Plaintiff
26 Court Street, Suite 2506
Brooklyn, NY 11242
(718) 522-5025

Please Reply to:

THE FEINSILVER LAW GROUP, P.C.
215 Millburn Avenue
Millburn, NJ 07041
(973) 376-44000